



Solutia Inc.  
702 Clydesdale Avenue  
Anniston, Alabama 36201 USA

June 10, 2021

Ms. Pamela J. Langston Scully, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

**RE: May 2021 Progress Report  
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)  
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find attached the May 2021 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003, the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013, and the Consent Decree for Remedial Design/Remedial Action for Operable Unit Nos. 1 and 2 between P/S and the EPA entered by the Court on March 26, 2021. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of May 1, 2021 through May 31, 2021. The report also describes upcoming developments anticipated for the months of June and July 2021.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

E. Gayle Macolly  
Manager, Remedial Projects  
Solutia Inc.

Attachments

cc: Ms. Sonja Favors (ADEM)  
Mr. Thomas Dahl



**MAY 2021 PROGRESS REPORT**  
**ANNISTON PCB SITE**  
**(DOCKET NO. 1:02-cv-0749-KOB)**  
**ANNISTON, ALABAMA**

USEPA I.D. No. ALD 004 019 048

Submitted For:

**Solutia Inc. and Pharmacia LLC**  
**702 Clydesdale Avenue**  
**Anniston, Alabama 36201**

June 10, 2021

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## **1.0 INTRODUCTION**

### **1.1 2003 Partial Consent Decree**

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9607, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of May 1, 2021 through May 31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of May 1, 2021 through May

31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.2 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.3 2021 Operable Unit 1/ Operable Unit 2 (OU-1/OU-2) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 1/Operable Unit 2 (OU-1/OU-2 RD/RA CD) between the EPA and P/S was entered by the Court on March 26, 2021 (Docket No. 1:02-cv-00749-KOB). The OU-1/OU-2 RD/RA CD provides for the implementation of the remedies selected for OU-1/OU-2 as described in the OU-1/OU-2 Record of Decision issued by Region 4 of the EPA on November 9, 2017. This includes remedial actions for soils, sediments and groundwater at residential and non-residential properties outside of the plant site (OU-3).

In accordance with of the OU-1/OU-2 RD/RA CD Scope of Work (Appendix B Paragraph 5.1), Section 4.0 of this report describes the work performed for the OU-1/OU-2 RD/RA CD during the period of May 1, 2021 through May 31, 2021, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 5.3 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-1/OU-2 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

## **2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD**

### **2.1 General 2003 CD Activities**

#### **2.1.1 Administrative Submittals**

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

### **2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2)**

#### **2.2.1 Residential Removal Properties Program**

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

During this reporting period, P/S continued to work with the local municipalities and property owners to implement the approved NTC Removal Action Interim IC Program for Residential Properties (Interim IC Program). Table 2 provides a summary of the number of properties in each IC group.

##### **2.2.1.1 Residential Removal Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. During this reporting period, there were no access activities.

Currently there are 12 residential properties in the Residential Removal Properties Program where access has not been granted and one property is scheduled for a removal action. The properties are summarized in Table 3, and a description of each property's status is presented in Table 4.

#### **2.2.1.2 Residential Removal Activities**

During this reporting period, P/S did not perform any surface or depth sampling. Validated sampling analytical data received during this reporting period are presented in Attachment A. Residential properties are summarized in Table 3.

### **2.3 Operable Unit 4 (OU-4)**

During this reporting period, did not perform any surface or depth sampling. Validated sampling analytical data received during this period are presented in Attachment B. Residential properties are summarized in Table 5.

Currently there is one residential property in the OU-4 Residential Removal Properties Program where access has not been granted. A description of the removal property's status is presented in Table 6.

During this reporting period, P/S continued to provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant in accordance with the approved construction support work plan. This project is scheduled to be completed by November 2021.

On January 20, 2021, P/S received comments from the EPA on the Technical Memorandum Summarizing Results of Comparative Analysis of Alternatives for OU-4. P/S will address these comments during the preparation of the OU-4 Feasibility Study (FS). On May 3, 2021, P/S requested an additional thirty day extension for submitting the OU-4 FS. On May 6, 2021, the EPA and the Court approved the request to extend the schedule to prepare the OU-4 FS. P/S will submit the OU-4 FS on or before June 21, 2021.

### **2.4 Technical Assistance Plan Grant**

The Technical Advisor, Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the CAG and the community.



## **2.5 Community Advisory Group**

A CAG meeting was held on May 11, 2021 via video teleconference. The meeting was open to the public to allow residents to observe the working session and comment or ask questions. Topics discussed at the CAG meeting included:

- an update from the Technical Advisor;
- an update from the EPA; and
- an update from P/S.

The next CAG meeting is scheduled for July 13, 2021 and will be held via video teleconference.

### **3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

#### **3.1 General OU-3 RD/RA CD Activities**

##### **3.1.1 Administrative Submittals**

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 7. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

#### **3.2 Remedial Action**

P/S are currently preparing a revised Institutional Controls Implementation and Assurance Plan (ICIAP) that documents the final remedial components performed as part of the completed RA work. The revised ICIAP will include an executed Environmental Covenant as required by the IROD. The Environmental Covenant has been executed by both P/S and ADEM and was recorded by the Calhoun County Probate Judge on February 16, 2021.

On January 22, 2021, P/S received comments from the EPA on the OU-3 Seep Investigation Report. On March 24, 2021, a video conference was held between the EPA, Special Master and P/S to discuss the comments on the Seep Investigation Report. P/S are currently preparing a response to those comments.

#### **4.0 OU-1/OU-2 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

##### **4.1 General OU-1/OU-2 RD/RA CD Activities**

###### **4.1.1 Administrative Submittals**

A CD submittal schedule for the OU-1/OU-2 RD/RA CD that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 8. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

On April 5, 2021, P/S submitted the Designation and Notification of Project Coordinator and Supervising Contractor for the OU-1/OU-2 RD/RA CD to the EPA in accordance with Section VI Paragraph 9 of the OU-1/OU-2 RD/RA CD. On April 7, 2021, EPA requested additional information regarding the Supervising Contractors. P/S submitted the additional information requested on April 15, 2021, and EPA approved the Supervising Contractors on April 16, 2021. This approval triggers the 60-day requirement to submit the Remedial Design Work Plan (RDWP). P/S will submit the RDWP on or before June 15, 2021.

On April 12, 2021, P/S submitted the Draft Notice to Successors in Title (Notice) to the EPA in accordance with Section VIII Paragraph 23 of the OU-1/OU-2 RD/RA CD. On May 14, 2021, P/S submitted a revised Notice with updates consistent with the filing requirements of Calhoun County, Alabama where the Notices will be recorded. P/S received comments from the EPA on May 18, 2021 and submitted a second revision to the Notice on May 20, 2021. EPA approval is pending.

On April 12, 2021, P/S submitted the Notice of Financial Assurance Mechanism to the EPA in accordance with Section IX Paragraph 26 of the OU-1/OU-2 RD/RA CD. P/S received EPA approval for the proposed financial assurance mechanism on May 24, 2021. P/S will submit the executed financial assurance mechanism to the EPA on or before June 23, 2021.

###### **4.1.2 OU-1/OU-2 Non-Residential Program**

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

On June 23, 2020, P/S submitted the Quintard Mall Redevelopment Construction Support Workplan. This plan outlines the support services that P/S will provide to the developer (Hull Properties) during the redevelopment of the Quintard Mall property in Oxford, Alabama. P/S will provide services necessary to support the appropriate management of PCB impacted soils generated from this infrastructure support project. EPA approved the Workplan on May 11, 2021.

#### **4.1.3 11<sup>th</sup> Street Ditch**

P/S will perform the next quarterly routine inspections in June 2021.

## **5.0 WORK SCHEDULED**

### **5.1 2003 CD Work Activities**

During the months of June and July 2021, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling and removal activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Prepare and submit Addendum No. 6 to the NTC Removal Action Completion Report for Residential Properties to document residential activities during 2020;
- Provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant (as necessary);
- Prepare and submit the OU-4 Feasibility Study;
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold a regularly scheduled meeting on July 13, 2021.

### **5.2 OU-3 RD/RA CD Work Activities**

During the months of June and July 2021, the following work elements are anticipated:

- Prepare and submit a revised ICIAP; and
- Respond to the EPA's comments on the OU-3 Seep Investigation Report.

### **5.3 OU-1/OU-2 RD/RA CD Work Activities**

During the months of June and July 2021, the following work elements are anticipated:

- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11<sup>th</sup> Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Provide construction support for the Quintard Mall redevelopment project (as necessary);

- Prepare and submit the OU-1/OU-2 RD/RA Consent Decree RD Work Plan and associated sub-plans;
- Prepare and submit certified copies of the recorded Notices to Successors-in-Title;
- Submit the executed financial assurance mechanism; and
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval.

## **TABLES**

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

Second Request for Schedule Extension for the OU-4 Feasibility Study	Submitted to EPA <b>Court Approval Received</b> <b>EPA Approval Received</b>	May 3, 2021 May 6, 2021 May 6, 2021
<b>Reports</b>		
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA <b>Approval Pending</b>	May 2, 2012
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b>	July 31, 2012 May 16, 2013 November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA	July 14, 2017
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 3	Submitted to EPA	June 4, 2018
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 4	Submitted to EPA	June 26, 2019
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 5	Submitted to EPA <b>Approval Pending</b>	April 24, 2020
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA <b>Approval Pending</b>	June 4, 2018
West 11th Street Sewer Line Repair Construction Completion Report - City of Anniston Water Works and Sewer Board	Submitted to EPA <b>Approval Pending</b>	June 12, 2018
Snow Street Drainage Improvement Project Completion Report Closure Report - Addendum No. 1	Submitted to EPA <b>Approval Pending</b>	July 10, 2019
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA <b>Approval Pending</b>	June 30, 2010
Former Holiday Inn Redevelopment Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 20, 2013
Miracle Field Construction Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	June 19, 2014
Anniston Regional Airport Fence Installation Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	July 23, 2014
Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 5, 2014
April 2020 Progress Report	Submitted to EPA	May 10, 2021
<b>Work Plan</b>		
Quintard Mall Redevelopment Construction Support Workplan	Submitted to EPA <b>Approval Received</b>	June 23, 2020 May 11, 2021
Notes:		
<sup>(1)</sup> The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.		



**TABLE 2**

**INTERIM IC GROUP COUNTS  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Area</b>	<b>IC Group 2<sup>1</sup></b>	<b>IC Group 3<sup>2</sup></b>	<b>IC Group 4<sup>3</sup></b>	<b>Total</b>
OU-1/2	326	100	48	<b>474</b>
OU-4	4	5	1	<b>10</b>
<b>Total</b>	<b>330</b>	<b>105</b>	<b>49</b>	<b>484</b>

<sup>1)</sup> IC Group 2 includes properties where residual PCB-containing soil may remain on the property but such presence has not been confirmed (e.g., PCBs beneath structures or driveways).

<sup>2)</sup> IC Group 3 includes properties where PCB levels in the surficial soil are less than 1 ppm, but are between 1 and 10 ppm at 12 inches or more below the existing ground surface. IC Group 3 properties may also include improvements (e.g., houses, driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed.

<sup>3)</sup> IC Group 4 includes properties where PCB levels in the surficial soil are greater than 1 ppm and have not been remediated (due to access issues or unsuitable areas). IC Group 4 properties may also include improvements (e.g., houses or driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed, and/or the property may contain PCBs between 1 and 10 ppm at 12 inches or more below the existing ground surface.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million

TABLE 3

## OU-1 RESIDENTIAL PROGRAM SUMMARY

## ANNISTON PCB SITE

Anniston, Alabama

<b>Residential Removal Action Program (Evaluation Areas 1-35) <sup>(1)</sup></b>		<b>May 2021</b>
No. of properties where access has been requested to surface sample		0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities		0
No. of properties where total access has been granted to surface sample		0
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties surface sampled in the footprint of a former structure/unsuitable area		0
No. of properties where depth, dust, and/or crawlspace samples were collected		0
No. of properties where validated analytical results were received		2
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>		<b>1231</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm <sup>(2)(3)</sup></b>		<b>11</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>		<b>19</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>		<b>9</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD) <sup>(3)(4)</sup></b>		<b>376</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed)</b>		<b>8</b>
<b>Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)</b>		<b>May 2021</b>
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties where depth, dust, crawlspace, and/or demo samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm in High Activity Areas</b>		<b>24</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>		<b>9</b>
<b>Residential Removal Action Program (Lead Site AOC Zone A)</b>		<b>May 2021</b>
No. of properties where access has been requested to surface sample		0
No. of properties where total access has been granted to surface sample		0
No. of properties where access has been requested for removal action activities		0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties surface sampled in the footprint of a former structure/unsuitable area		0
No. of properties where depth, dust and/or crawlspace samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties transferred from the Foothills Community Partnership and/or EPA		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>		<b>440</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>		<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>		<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>		<b>81</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>		<b>2</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>		<b>2</b>

**TABLE 3**  
**OU-1 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program (Lead Site AOC Zone B)</b>	<b>May 2021</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>525</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>120</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>3</b>

Notes:

<sup>(1)</sup> Evaluation Areas 1-34 also represents the Lead Site AOC Zones C and D.

<sup>(2)</sup> Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

<sup>(3)</sup> This total includes four properties where removals have previously been completed, but additional removals are required.

<sup>(4)</sup> This total includes 3 Appendix 6 properties within Evaluation Areas 1-35 where removals were completed by Solutia.

TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D  
ANNISTON PCB SITE  
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street <sup>(2)</sup>	2820	3	C	Non-Responsive
1407 Glen Addie Avenue <sup>(2)</sup>	765	24	C	Non-Responsive
509 W. 13th Street	1136	24	C	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
2106 W. 10th Street	2128	15	D	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
807 Bancroft Avenue	2443	34	D	Owner Declined Removal Access
716 Montrose Avenue <sup>(2)</sup>	2500	11	D	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) <sup>(1)</sup>	973	21	C	Owner Not Found
1021 & 1035 Parker Street <sup>(1)(2)</sup>	1635	33	C	Removal Action Scheduled

Notes:

<sup>(1)</sup> Portions of property are no longer unsuitable for removal.

<sup>(2)</sup> Property requires additional removal action.

**TABLE 5**  
**OU-4 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program (Evaluation Areas 1-35) <sup>(1)</sup></b>	<b>May 2021</b>
No. of properties where access has been requested to surface sample	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust, and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	1
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>	<b>22</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm</b>	<b>1</b>
<b>Total no. of removal action properties completed by Solutia</b>	<b>11</b>

**TABLE 6**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN OU-4  
ANNISTON PCB SITE  
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

TABLE 7

**OU-3 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

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**Administrative Issues**


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**Reports**


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OU-3 Construction Completion Report	Submitted to EPA	January 22, 2018
OU-3 Construction Completion Report Addendum	Submitted to EPA <b>Approval Pending</b>	July 27, 2018
OU-3 Operations and Maintenance Plan for Remedial/Corrective Action Projects: Revision 1.0	Submitted to EPA <b>Approval Pending</b>	August 7, 2018
OU-3 Seep Investigation Report	Submitted to EPA <b>Comments Received</b>	August 31, 2020 January 22, 2021
2020 Annual Groundwater Detection Monitoring and Corrective Action Effectiveness Report	Submitted to EPA	April 28, 2021

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**Work Plan**


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Seep Investigation: Interim Results and Updated Work Plan	Submitted to EPA <b>Approval Pending</b>	November 25, 2019
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TABLE 8

## OU-1/OU-2 CONSENT DECREE SUBMITTAL SCHEDULE

## ANNISTON PCB SITE

*Anniston, Alabama***Administrative Issues**

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Notification of Financial Assurance Mechanism	Submitted to EPA <b>Approval Received</b>	April 12, 2021 May 24, 2021
Draft Notice of Successors-in-Title	Submitted to EPA <b>Revision Submitted</b> <b>Comments Received</b> <b>Revision Submitted</b> <b>Approval Pending</b>	April 12, 2021 May 14, 2021 May 18, 2021 May 20, 2021

**Reports**

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**Work Plan**

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**ATTACHMENT A**

**OU-1/OU-2 Residential Removal Properties Analytical Results Update**

# OU-1/OU-2 RESIDENTIAL REMOVAL PROPERTIES ANALYTICAL RESULTS UPDATE

Anniston PCB Site  
Consent Decree

Sample Control ID	Sample Type	Sample Date	Yard	Soil Depth (in)	Total PCBs (ppm)	Total Lead (ppm)	Lead TCLP (mg/L)
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## EPA Zone: C

400 1st Ave

3584: 11-22-01-12-03-1-76, Eval. Area: 13, EPA Zone: C

### Surface

3584-3C	Composite	11/30/2004	Misc/Side	0 - 3	0.688 J	32 J	-
3584-3D	Composite	11/30/2004	Misc/Side	0 - 3	0.816 J	38 J	-
3584-3E	Composite	4/28/2021	Demo	0 - 3	0.137 J	45	-
3584-3E-X	Composite	4/28/2021	Demo	0 - 3	0.244 J	52	-

### Depth

3584-24A	Composite	11/30/2004	Front	12 - 24	< 0.08	-	-
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### Dust

3584-DU	Grab	11/30/2004	House	-	1.28	-	-
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1021 & 1035 Parker St

1635: 11-22-01-11-1-2 (Includes Parcel 8701), Eval. Area: 33, EPA Zone: C

### Surface

1635-3A	Composite	5/17/2007	Front	0 - 3	1.05	37	-
1635-3B	Composite	5/17/2007	Misc/Side	0 - 3	< 0.079	24	-
1635-3C	Composite	5/17/2007	Back	0 - 3	< 0.078	32	-
1635-3D	Composite	5/17/2007	Misc/Side	0 - 3	< 0.086	28	-
1635-3E	Composite	5/17/2007	Front	0 - 3	0.96	110	-
1635-3F	Composite	5/17/2007	Back	0 - 3	0.113	39	-
1635-3G	Composite	5/17/2007	Misc/Side	0 - 3	0.195	48	-
1635-3H	Composite	5/17/2007	Misc/Side	0 - 3	0.47	110	-
1635-3I	Composite	5/17/2007	Misc/Side	0 - 3	0.23	42	-
1635-3J	Composite	5/17/2007	Misc/Side	0 - 3	0.182	36	-
1635-3K	Composite	5/17/2007	Misc/Side	0 - 3	0.175	28	-
1635-3L	Composite	4/27/2010	P Unsuit	0 - 3	1.98	87 J	-

### Depth

1635-24A	Composite	7/11/2007	Front	12 - 24	0.178	-	-
1635-24L	Composite	4/28/2021	Misc/Side	12 - 24	0.741 J	-	-

### Crawlspace

1635-CS	Grab	7/11/2007	Crawl Sp.	-	< 0.079	-	-
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Legend: CFS = Confirmatory Sample  
DU = Dust Sample  
J = Estimated Value

X = Duplicate Sample

**ATTACHMENT B**

**OU-4 Residential Removal Properties Analytical Results Update**

# OU-4 RESIDENTIAL REMOVAL PROPERTIES ANALYTICAL RESULTS UPDATE

Anniston PCB Site  
Consent Decree

Sample Control ID	Sample Type	Sample Date	Yard	Soil Depth (in)	Screening (ppm)	Total PCBs (ppm)	Total Lead (ppm)
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167 Howard Valley Rd

600115: 07-06-14-0-0-7 (formerly 173 Howard Valley Rd)

## Surface

600115-01	Composite	4/4/2012	Misc/Side	0 - 3	-	0.22	16
600115-02	Composite	4/4/2012	Misc/Side	0 - 3	-	3.15	31
600115-03	Composite	4/4/2012	Misc/Side	0 - 3	-	0.329	14
600115-04	Composite	4/28/2021	Demo	0 - 3	-	< 0.019 UJ	16

## Depth

600115-02-24	Composite	6/6/2012	Misc/Side	12 - 24	-	0.179 J	-
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## Crawlspace

600115-CS	Grab	6/6/2012	Crawl Sp.	-	< 1	< 0.15	-
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Legend: CFS = Confirmatory Sample  
CFS2 = 2nd Confirmatory Sample  
X = Duplicate Sample

DU = Dust Sample  
J = Estimated Value